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*ATTORNEYS FOR KEELING CATTLE FEEDERS*

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

IN RE:	§	
	§	
MCCLAIN FEED YARD, INC., et al., <sup>1</sup>	§	CASE NO. 23-20084-RLJ-7
	§	
Debtors.	§	Jointly Administered

**WITNESS AND EXHIBIT LIST OF KEELING CATTLE FEEDERS, INC.**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

*KEELING CATTLE FEEDERS, INC.* (“Keeling”) files this Witness and Exhibit List for the hearing set for April 11, 2024 on Rabo’s Motion for Relief from Automatic Stay or, Alternatively, for Abandonment of Certain Cattle and Proceeds of Cattle [ECF No. 192] and would show the Court as follows:

**I.**  
**WITNESS LIST**

Keeling expects to call some or all of the following witnesses:

1. Scott Keeling; and
2. All witnesses designated or called by other parties.

Keeling further reserves the right to call rebuttal or impeachment witnesses.

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<sup>1</sup> The Debtors in these chapter 7 cases are: McClain Feed Yard, Inc. (Case No. 23-20084-RLJ), McClain Farms, Inc. (Case No. 23-20085-RLJ), and 7M Cattle Feeders, Inc. (Case No. 23-20086-RLJ)

**II.**  
**EXHIBIT LIST**

1. Trust Detail Report for trust funds being held by David LeBas
2. Keeling Cattle Feeders Agreements with McClain
3. E-mail dated April 2023 related to removal of 49 head of cattle belonging to Brian McClain held at Keeling; subject “Keeling Cattle Feeders Report”
4. Closeout records from Keeling Cattle Feeders

Keeling reserves the right to offer any exhibit designated by other parties and present exhibits for rebuttal or impeachment purposes and to offer any documents or pleadings filed in this bankruptcy proceeding.

Keeling reserves the right to supplement or amend this list any time prior to the hearing.

Respectfully submitted,

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By: /s/ David L. LeBas  
David L. LeBas

**ATTORNEYS FOR KEELING CATTLE  
FEEDERS**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served via electronic and/or U.S. Mail on April 8, 2024 upon all parties entitled to such notice as provided by the ECF filing system and via first class mail to all creditors.

/s/ David LeBas  
David LeBas